

Summary of the ELAB PBM Subcommittee Teleconference October 14, 1996

The Performance Based Methods (PBM) subcommittee of the Environmental Laboratory Advisory Board (ELAB) convened by teleconference on October 14, 1996, at 11 am. The meeting was led by its chair, Dr. Kathy Hillig of BASF Corporation. *The purpose of this meeting was to begin discussion of PBM and implementation issues, particularly the Environmental Protection Agency's (EPA's) and States' requirements for recordkeeping and documentation.* Material distributed to the subcommittee from Mr. Joe Slayton of EPA Region 3 included:

- ! an introduction to PBM system (7/13/96),
- ! a draft memo discussing PBM implementation (Rev. 9/1/96),
- ! a checklist overview (7/13/96),
- ! a checklist for initial demonstration of method performance (7/13/96),
- ! a checklist for continuing demonstration of method performance, and
- ! a certification statement (7/13/96).

A list of action items is provided in Attachment A. A list of participants is given in Attachment B. The prepared agenda included discussion of these materials and comparison of the attached definitions with other definitions for PBMs.

MISCELLANEOUS ITEMS

Ms. Jeanne Mourrain, the Designated Federal Official for ELAB, indicated that this subcommittee functions under the rules of the Federal Advisory Committee Act (FACA). Hence the conclusions and findings of this subcommittee should be directed to ELAB for its consideration. ELAB will then make their recommendations to the Board of Directors of the National Environmental Laboratory Accreditation Conference (NELAC), and the appropriate NELAC committees will be informed of ELAB's recommendations. Dr. Hillig asked that one of the committee members consider volunteering to draft the committee's report to ELAB.

BACKGROUND OF PBM

Dr. Hillig introduced Mr. Joe Slayton of USEPA, Region 3, who is a co-chair of the EMMC Performance Based Measurements (PBM) subcommittee. Mr. Slayton began the discussion by reviewing the history of EPA's activity on performance based methods. He noted that PBM focuses on the quality objectives of measurements for the intended data use rather than on the use of specified reference methods. This is particularly important for situations in which measurement performance required by regulation or law cannot be achieved using approved reference methods. An important goal of PBM is to progress to a self-monitoring of daily measurement activities. In order to assist with uniform implementation of PBM, a series of checklists has been prepared.

CHECKLISTS

One of the uses of the checklist for initial demonstration of method performance is to allow a

project officer to specify the measurement quality objectives required for a particular project. Mr Slayton noted that planners would have the option to consider non-reference methods if no reference methods meet the performance requirements.

IMPLEMENTATION

Implementation of PBM throughout EPA's program offices is an issue being addressed. Each program office would be responsible for making appropriate announcement of specified changes and for providing training and other resources necessary for full implementation of a PBM approach to measurement quality. The checklists can be used throughout all programs, with the understanding that in certain instances items not applicable to that program can be marked "N/A". It was noted that Chapter 5 of the NELAC Standards (Quality Systems) presently contains provision for PBM.

Implications for Inspections

An issue resulting from PBM implementation that will impact inspectors relates to inspections. Presently, inspectors address laboratory quality issues that are prescribed in detail; under PBM, inspectors will need to be able to understand the implications of laboratory-specific method modifications and be able to critically assess the performance of a laboratory.

Performance Criteria

The issue of how to specify performance criteria was discussed. It was noted that it appears reasonable to write broad specifications such as "one-half the permit limit", without resorting to permit-specific criteria.

Information-Sharing

The possibility of sharing performance data across the environmental laboratory community was raised. While this has been discussed, there are no plans by EPA for developing or supporting such a resource.

Acceptability in EPA

The issue of EPA's program offices accepting data generated using PBM was discussed. If the PBM approach is to be successfully implemented, it must be legally acceptable to all program offices.

Role of Reference Methods

It was noted that there will continue to be a need for reference methods in meeting regulatory requirements.

NEXT MEETING

The next teleconference of this subcommittee will be scheduled by the chair after polling the members for preferred dates. Committee members should review the minutes of this meeting and Chapter 5 of the NELAC Standards.

ACTION ITEMS
ELAB PBM Subcommittee Teleconference
October 14, 1996

Action	Date Completed
Committee members should review Chapter 5 of the Standards to prepare for the next meeting.	

**LIST OF PARTICIPANTS
ELAB PBM Subcommittee Teleconference
October 14, 1996**

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